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**UNITED STATES DEPARTMENT OF JUSTICE**  
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TRACY HOPE DAVIS

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEVADA**

In re

CASH CLOUD, INC. dba COIN CLOUD,

Debtor.

Case No: 23-10423-mkn

Chapter 11

Date: February 28, 2024

Time: 9:30 a.m.

**UNITED STATES TRUSTEE'S NOTICE OF VOLUNTARY  
REDUCTION IN LEGAL FEES WITH RESPECT TO FIRST INTERIM  
APPLICATION FOR COMPENSATION FILED BY DEBTOR'S  
GENERAL BANKRUPTCY COUNSEL, FOX ROTHSCHILD LLP**

Tracy Hope Davis, United States Trustee for Region 17 (United States Trustee"), by and through her undersigned counsel, hereby files this *Notice of Voluntary Reduction in Legal Fees with Respect to the First Interim Application for Compensation* filed by Debtor's general bankruptcy counsel, Fox Rothschild LLP (the "Applicant" and "Application") in the above-captioned case.

In support, the United States Trustee respectfully represents as follows:

1. The fee applicant bears the burden of proof to show entitlement to the requested fees under 11 U.S.C. § 330. *See In re Eliapo*, 298 B.R. 392, 402 (B.A.P. 9th Cir. 2003), *rev'd in part on other grounds*, 468 F.3d 592 (9th Cir. 2006); *In re Ginji Corp.*, 117 B.R. 983, 990

1 (Bankr. D. Nev. 1990) (“[t]he applicant ... has the burden of proof to show the reasonableness of  
2 the fees sought”).

3 2. Interim fee awards are always subject to reexamination during a bankruptcy case.  
4 *See In re Strand*, 375 F.3d 854, 858 (9th Cir. 2004).

5 3. The United States Trustee has reached an agreement with the Applicant to resolve  
6 the United States Trustee’s informal opposition to the Application prior to the above-captioned  
7 hearing.  
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9 4. Debtor’s general bankruptcy counsel, Fox Rothschild LLP (“Fox Rothschild”),  
10 has consented to a voluntary reduction of \$22,728.63 in legal fees to address various legal service  
11 descriptions that, in the United States Trustee’s view, are vague, reflect block billing, and contain  
12 a few duplicate billing entries. After accounting for Fox Rothschild’s voluntary reduction, the  
13 Application now requests a total of \$2,221,973.37 in legal fees and \$21,805.01 in expenses. *See*  
14 ECF No. 1593. Considering this voluntary reduction, the United States Trustee does not object  
15 to approval of Fox Rothschild’s first interim fee Application.  
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19 Dated: February 14, 2024

TRACY HOPE DAVIS  
UNITED STATES TRUSTEE

21 /s/ Jared A. Day  
Jared A. Day  
22 Trial Attorney for the United States Trustee  
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